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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 UNITED STATES OF AMERICA, ) **2:13-cr-00070-GMN-PAL**  
11 Plaintiff, )  
12 vs. ) **STIPULATION FOR PROTECTIVE ORDER**  
13 ALLAN DOBKOWSKI, et al )  
14 Defendants. )  
15

16 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,  
17 United States Attorney for the District of Nevada, and Andrew W. Duncan, Assistant United States  
18 Attorney, counsel for the United States, Paola M. Armeni, counsel for defendant FRANK EVANS,  
19 that this Court issue an Order protecting from disclosure to the public any discovery documents  
20 containing the personal identifying information such as social security numbers, drivers license  
21 numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such  
22 documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

23 1. Protected Documents which will be used by the government in its case in chief include  
24 personal identifiers, including social security numbers, drivers license numbers, dates of birth, and  
25 addresses, of participants, witnesses, and victims in this case.  
26

1           2.     Discovery in this case is voluminous. Many of the documents include personal  
2     identifiers.

3           3.     The United States agrees to provide Protected Documents without redacting the  
4     personal identifiers of participants, witnesses, and victims.

5           4.     Access to Protected Documents will be restricted to persons authorized by the Court,  
6     namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and  
7     secretaries employed by the attorney(s) of record and performing on behalf of defendant.

8           5.     The following restrictions will be placed on defendant, defendant's attorney(s) and the  
9     above-designated individuals unless and until further ordered by the Court. Defendants, defendants'  
10    attorneys and the above-designated individuals shall not:

11           a.     make copies for, or allow copies of any kind to be made by any other person  
12    of Protected Documents;

13           b.     allow any other person to read Protected Documents; and

14           c.     use Protected Documents for any other purpose other than preparing to defend  
15    against the charges in the Superseding Indictment or any further superseding indictment arising out  
16    of this case.

17           6.     Defendant's attorney(s) shall inform any person to whom disclosure may be made  
18    pursuant to this order of the existence and terms of this Court's order.

19           7.     The requested restrictions shall not restrict the use or introduction as evidence of  
20    discovery documents containing personal identifying information such as social security numbers,  
21    drivers license numbers, dates of birth, and addresses during the trial of this matter.

22           8.     Upon conclusion of this action, defendant's attorney(s) shall return to government  
23    counsel or destroy and certify to government counsel the destruction of all discovery documents

24    . . .

25    . . .

1 containing personal identifying information such as social security numbers, drivers license numbers,  
2 dates of birth, and addresses within a reasonable time, not to exceed thirty days after the  
3 last appeal is final.

4 DANIEL G. BOGDEN  
5 United States Attorney

6 \_\_\_\_\_/s/\_\_\_\_\_  
7 ANDREW W. DUNCAN  
8 Assistant United States Attorney

7/9/2013  
DATE

9 \_\_\_\_\_/s/\_\_\_\_\_  
10 PAOLA M. ARMENI  
11 Counsel for defendant  
12 FRANK EVANS

6/5/2013  
DATE

13 **ORDER**

14 IT IS SO ORDERED this 37<sup>th</sup> day of June, 2013.

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16   
17 UNITED STATES OF CALIFORNIA JUDGE